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Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

99-200

96-98

Re: Petition of the Connecticut Department of Public Utility Control for
Authority to Conduct a Transitional Service Technology Specific
Service Overlay Trial

Dear Ms. Salas:

Enclosed please find one original and six copies of the Connecticut
Department of Public Utility Control Petition for Authority to Conduct a
Transitional Service Technology Specific Service Overlay Trial.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise Rickard
Acting Executive Secretary

Enc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Petition of the
Connecticut Department of Public Utility Control
for Authority to Conduct a Transitional
Service Technology Specific Overlay Trial

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL
FOR AUTHORITY TO CONDUCT A TRANSITIONAL
SERVICE TECHNOLOGY SPECIFIC SERVICE OVERLAY TRIAL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

March 7, 2001

Connecticut Department of
Public Utility Control

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
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for Authority to Conduct a Transitional)	
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PETITION OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL
FOR AUTHORITY TO CONDUCT A TRANSITIONAL
SERVICE TECHNOLOGY SPECIFIC SERVICE OVERLAY TRIAL

I. Introduction and Summary

In the Federal Communications Commission (FCC or Commission) December 7, 2000 Second Report and Order, Order on Reconsideration in CC Docket No. 96-98, and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (FNPRM), the Commission sought comments concerning implementation of transitional service- or technology-specific overlays (TSTSO) by the states, subject to certain conditions. FNPRM ¶¶130-143. While the Commission has sought comments concerning how a TSTSO should be implemented, a trial providing actual data would offer the Commission the necessary evidence that it requires to ensure that such an area code relief approach meets its requirements and the needs of the industry and the public.

In light of the Commission's willingness to permit states to implement TSTSOs, the Connecticut Department of Public Utility Control (CTDPUC)

requests that a TSTSO trial be conducted in Connecticut. Such a trial would provide the Commission with additional information concerning the feasibility of the full implementation of TSTSO as part of the Commission's national numbering resource optimization strategy while offering CTDPUc an additional means of addressing NPA exhaust in Connecticut at the same time. Accordingly, as discussed in its February 14, 2001 Comments submitted in response to the FNPRM, CTDPUc reaffirms its request for the opportunity to conduct a formal TSTSO trial in Connecticut.

II. Discussion

According to the Commission, by temporarily diverting a portion of the demand for numbering resources in existing area codes, implementation of service- or technology-specific overlays may help ease the transition to needed area code relief prior to the complete implementation of pooling, reducing end user costs and inconveniences. FNPRM, ¶128. CTDPUc concurs. CTDPUc believes that implementation of TSTSOs would offer states another tool to address telephone number exhaust issues. Indeed, opening a third area code in Connecticut for nonLNP-capable carriers should extend numbering resources in the underlying area code, optimize telephone number usage in that NPA, and offer relief to those carriers participating in the TSTSO NPA because they would have a greater supply of NXX codes to assign telephone numbers from the new NPA than from the underlying area code that is currently nearing exhaust.

CTDPUc also believes that such a trial should be conducted in Connecticut for several reasons. For example, two unopened NPAs have been

assigned to Connecticut in anticipation of CTDPUc implementing an approved area code relief plan (i.e., all services overlay) in the 203 and 860 NPAs. Connecticut also has pooling trials currently underway in both NPAs and the remaining numbering resources in those area codes would, upon the opening of the TSTSO, provide for an optimal and efficient number assignment in the underlying area code. Lastly, while 10-digit dialing would not be required initially, CTDPUc notes that 10-digit dialing is currently in effect for approximately 45% of all local calls in Connecticut. Consequently, because almost one-half of the state already has become acclimated to 10-digit dialing, the CTDPUc does not believe that its imposition when required, would be an issue.

CTDPUc is also in favor of conducting a TSTSO trial in Connecticut because with pooling in the underlying NPA, the life of that area code would be extended as the remaining telephone numbers are assigned to the LNP-capable carriers. Moreover, as pooling is introduced for nonLNP-capable carriers in November 2002, the numbering resources in the new TSTSO NPA would be further extended. Therefore, telephone number resources could be assigned in both NPAs indefinitely and more importantly, the underlying area codes would not exhaust as quickly as they normally would.

Lastly, in March, 1998, CTDPUc petitioned the Commission requesting that it reconsider its August 8, 1996 Second Report and Order and Memorandum Opinion and Order in FCC 96-333, In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Interconnection Between Local Exchange for Dallas and Houston, Ordered by the Public Utility

Commission of Texas; Administration of the North American Numbering Plan; and Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois. Specifically, CTDPUK sought authority to implement a service specific overlay in Connecticut. CTDPUK is of the opinion that the TSTSO meets the intent of its March 1998 Petition and believes that it offers another approach to address area code relief issues in Connecticut. Therefore, CTDPUK hereby requests the Commission's authority to immediately begin implementing a TSTSO trial in Connecticut.

III. Conclusion

CTDPUK believes that implementing a TSTSO is in the public interest and requests the Commission's authority to immediately begin conducting a TSTSO trial in Connecticut. NXX codes in Connecticut's two existing NPAs are approaching exhaust and conducting such a trial now would be timely and meet the needs of the industry and the public. Lastly, implementing a TSTSO meets the intent of CTDPUK's March 1998 petition for authority to implement a service specific area code and appears to be a workable solution for area code

relief in Connecticut. CTDPUC stands ready to work with the Commission and the industry to begin implementing a TSTSO and hereby requests the authority to conduct such a trial immediately.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF
PUBLIC UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

March 7, 2001

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION

Miriam L. Theroux
Commissioner of the Superior Court